

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MARY REFERMAT,

Plaintiff

vs.

Civ. No. : 14-CV-0712

LANCASTER CENTRAL SCHOOL SYSTEM,

Defendant

**NOTICE OF MOTION
FOR SUMMARY JUDGMENT**

NATURE OF ACTION:

Alleged employment discrimination under the Age Discrimination Act of 1967, Title VII of the Civil Rights Act of 1964 as amended, and the New York Human Rights Law.

MOVING PARTY:

Defendant.

DIRECTED TO:

Plaintiff.

DATE and TIME:

To Be Determined By The Court.

PLACE:

United States District Courthouse,
2 Niagara Square
Buffalo, New York 14202

SUPPORTING PAPERS:

Declaration of Brendan P. Kelleher with attached exhibits; Statement of Uncontested Facts; and Memorandum of Law.

ANSWERING PAPERS:

Pursuant to Local Rule 7.1(c), the opposing party is required to file and serve answering papers, if any, in accordance with the Court's scheduling order. The moving party intends to file and serve reply papers.

RELIEF REQUESTED:

An Order granting the Defendant Summary Judgment on all claims, and dismissing the Plaintiff's Complaint in its entirety, and for such other and further relief as the Court may deem just and proper.

GROUND FOR RELIEF:

Rule 56 of the Federal Rules of Civil Procedure and others. There are no triable issues of fact, and judgment should be granted as a matter of law.

ORAL ARGUMENT:

Requested.

Dated: Buffalo, New York
May 5, 2017

HARRIS BEACH, PLLC
Attorneys for Defendant
LANCASTER CENTRAL SCHOOL DISTRICT

/s/ Brendan P. Kelleher
Brendan P. Kelleher, Esq., Of Counsel
Larkin at Exchange – Ste. 1000
726 Exchange Street
Buffalo, New York 14210
716-200-5119

TO: SANDERS & SANDERS
Harvey Sanders, Esq.
Attorneys for Plaintiff
401 Maryvale Drive
Cheektowaga, New York 14225
716-839-1489

274160 3086064